UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 27 2015

CERTIFIED MAIL 7009 1680 0000 7669 3431
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Morgan Mullikin
President
Castalloy Corporation
1701 Industrial Lane
Waukesha, Wisconsin 53187-7397

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID: WID056068802

Dear Mr. Mullikin:

On May 20, 2015, a representative of the U.S. Environmental Protection Agency inspected the Castalloy Corporation ("Castalloy") located in Waukesha, Wisconsin. As a small quantity generator of hazardous waste, Castalloy is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Castalloy's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Castalloy, EPA's review of records pertaining to Castalloy, and the inspector's observations, EPA has determined that Castalloy has unlawfully stored hazardous waste without a license or interim status as a result of Castalloy's failure to comply with certain conditions for a license exemption under Wis. Admin. Code § NR 662.192(1) and (4) [40 C.F.R. § 262.34(c)-(f)]. EPA has identified the license exemption conditions with which Castalloy was out of compliance at the time of the inspection in paragraphs 1- 4, below.

The conditions identified in paragraphs 1-2 are also independent license exemption requirements for generators that are in and of themselves violable.

The conditions identified in paragraphs 3-4 are also independent license exemption requirements incorporated from Wis. Admin. Code ch. NR 665 [40 C.F.R. Part 265] that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSDF requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from the TSDF requirements, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSDF requirement in Wis. Admin. Code ch. NR 665 [40 C.F.R. Part 265] if the facility should have fully complied with the requirements for interim status, or Wis. Admin. Code ch. NR 664 [40 C.F.R. Part 264] if the facility should have been permitted.

Lastly, EPA has determined that Castalloy violated RCRA requirements related to hazardous waste determinations, manifests, and universal waste, as described in paragraphs 5-7, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS THROUGH VIOLATIONS OF LICENSE EXEMPTION REQUIREMENTS AND OF TSDF REQUIREMENTS

The license exemption conditions identified in paragraphs 1 and 2, below, are also license exemption requirements violated by Castalloy:

1. Emergency Procedures

   Under Wis. Admin. Code §§ NR 662.192(1)(e)2.a.-c. [40 C.F.R. §§ 262.34(d)(5)(ii)(A)-(C)],a small quantity generator must post the following information next to the telephone:

   - The name and telephone number of the emergency coordinator next to the telephone.
   - Location of fire extinguishers and spill control material, and if present, fire alarm.
   - The telephone number of the fire department, unless the facility has a direct alarm.

   At the time of the inspection, Castalloy did not identify the emergency coordinator for the facility in their telephone list next to the telephone. Also, though Castalloy did have a list of emergency equipment near the phone, this list did not include locations of fire extinguishers, spill control material, or the fire alarm.

2. Personnel Training

   Under Wis. Admin Code § NR 662.192(1)(e)3. [40 C.F.R. § 262.34(d)(5)(iii)], a small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

   At the time of the inspection, it did not appear that facility personnel had been familiarized with hazardous waste management requirements and procedures relevant to their job responsibilities. For example, on at least two occasions, wastes that had been determined to be hazardous were shipped off-site as non-hazardous waste because inappropriate waste profile numbers were applied to the shipment. See Paragraph 6 for additional information.

The license exemption conditions identified in paragraphs 3 and 4, below, are also independent TSDF requirements violated by Castalloy:

3. Maintenance and Operation of Facility

   Under Wis. Admin. Code §§ NR 662.192(1)(d) and 665.0031 [40 C.F.R. §§ 262.34(d)(4) and 265.31] a small quantity generator of hazardous waste must maintain the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

   At the time of the inspection, Castalloy had determined wastes generated from the plasma and arc air cutters to be a hazardous waste. The table on which the cutting takes place and the

surrounding area appeared to be accumulating these wastes, which may negatively affect the health of the workers in that area.

4. Arrangements with Local Authorities

Under Wis. Admin. Code §§ NR 662.192(1)(d) and 665.0037(1)(d) [40 C.F.R. §§ 262.34(d)(4) and 265.37(a)(4)], a small quantity generator of hazardous waste must make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

At the time of the inspection, Castalloy had not familiarized the local hospital with potential injuries that employees could incur at the facility.

Summary of license exemption conditions: By violating the conditions for a license exemption, above, Castalloy became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. Castalloy failed to apply for such a license. Castalloy's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 680.30, 680.31, and 680.32 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Wis. Admin. Code ch. NR 665 is also an independent violation of the corresponding TSDF requirement.

WASTE DETERMINATION, MANIFEST, AND UNIVERSAL WASTE VIOLATIONS

5. Hazardous Waste Determination

Under Wis. Admin. Code § NR 662.011[40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous. A generator must keep records of any test results, waste analyses, or other determinations made in accordance with Wis. Admin. Code § NR 662.011[40 C.F.R. § 262.11]. See, Wis. Admin Code § NR 662.040(3) [40 C.F.R. § 262.40(c)].

Castalloy generates and mixes the following waste streams prior to shipment of the combined waste stream to a non-hazardous landfill:

- Grinding swarf from grinding operations (including the diamond grinder);
- Floor sweepings from facility housekeeping;
- Sand fines from foundry pouring, cooling, and shakeout operations; and
- Shot blast fines from finishing operations.

A combined sample of foundry sand and blasting wastes was used to make a non- hazardous waste determination for each of the above individual waste streams. Castalloy did not use separate samples for each waste stream to determine if the individual streams were hazardous prior to mixing. Additionally, it was not determined during the inspection whether the coreless induction furnaces generated wastes from air emission control devices. Documentation of a waste determination for this material, if generated, was not presented during the inspection.

6. Hazardous Waste Manifests

Under Wis. Admin. Code § NR 662.020 [40 C.F.R. § 262.20], a generator who transports, or offers for transport, a hazardous waste for offsite treatment, storage or disposal, must prepare a Manifest on EPA Form 8700-22.

On the following three separate occasions, Castalloy failed to prepare a hazardous waste manifest for discarded bag house dust filter cartridges and/or discarded bag house dust, both of which have been determined to be characteristically hazardous for chromium:

- 12-11-2013 (waste tracking number 121103)
- 3-3-2015 (waste tracking number 030318)
- 5-1-2015 (waste tracking number 050120)

Note: According to an e-mail from Mr. Bryan Burton of Castalloy dated June 24, 2015, the root cause of this violation was the inadvertent use of an outdated non-hazardous waste profile for these waste streams. This profile has since been deactivated. EPA does not request any further response for this violation.

7. Universal Waste Requirement

Under Wis. Admin. Code § NR 673.14(5) [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste must label or clearly mark each lamp or a container or package in which such lamps are contained with any one of the following phrases: "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

At the time of the inspection, Castalloy's containers of lamps were not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

CONCLUSION

At this time, EPA is not requiring Castalloy to apply for a Wisconsin hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs 1-4, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with each of the above conditions and requirements. You should submit your response to Brenda Whitney U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at whitney.brenda@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Dolores Hayden, WDNR - Dolores.Hayden@wisconsin.gov
Michael Ellenbecker, WI DNR - Michael.Ellenbecker@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	May 20, 2015
Facility Name:	Castalloy Corporation
Facility Address:	1701 Industrial Lane P.O. Box 827 Waukesha, Wisconsin 53189-7397
EPA RCRA ID Number:	WID056068802
Generator Status:	Small Quantity Generator
Facility Contact:	Morgan J. Mullikin President
U.S. EPA RCRA Inspector:	Brenda Whitney - Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

Prepared By: Brenda Whitney – Environmental Engineer — 6-2-15 Date

Approved By: Julie Morris – Chief, Compliance Section 2 — 6/2/15 Date

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI or "Inspection") of the Castalloy Corporation ("Castalloy" or "Facility") located in Waukesha, Wisconsin, on May 20, 2015. This CEI was an evaluation of Castalloy's compliance with the RCRA hazardous waste regulations codified in the Wisconsin Administrative Code and the Code of Federal Regulations. The Facility has notified as a small quantity generator of hazardous waste generating less than 1,000 kilograms of hazardous waste per month. Dolores Hayden of the WDNR was unable to participate in this CEI.

Participants

Morgan Mullikin – President	Castalloy
Katie Hunkins – Safety Coordinator	Castalloy
Terry Jahnke – Maintenance Manager	Castalloy
Brenda Whitney – Environmental Engineer	U.S. EPA

Introduction

I displayed official credentials to the Facility personnel upon arrival at Castalloy at approximately 8:30 a.m. I signed the visitor logbook and was introduced to Mr. Mullikin and Mr. Jahnke. During an introductory briefing with these facility representatives, I delineated the purpose and logistics of the CEI, and explained that I would be taking photographs in the facility as needed. I also explained that the inspection stemmed in part from an Agency review of the Toxic Release Inventory (TRI) database and of OSHA press releases. Mr. Mullikin clarified that the OSHA complaint noted in a press release dated June 4, 2013, was dropped and no penalty was assessed.

Site Description

The following information about Castalloy is based on the personal observations of the EPA inspector and on representations made during the Inspection by the Facility personnel identified above or within the text.

Castalloy opened its doors in 1973, with a second addition opening in 1980, and the third and final section competed in 1988. Currently, the facility occupies 100,000 ft^2 of manufacturing and office space and houses approximately 100 employees. Castalloy is a separate entity under the umbrella of Noricon, a holding company. Although there are several Castalloy companies throughout the world, they are in no way related either to this facility or to Noricon.

According to the website www.castalloycorp.com, Castalloy produces high alloy abrasion, corrosion, and heat-resistant commercial castings and offers engineering design, non-destructive testing, machining, fabrication, and assembly at their facility. The alloys used at this facility include iron, chromium, molybdenum, manganese, carbon, nickel and various other components depending on customer specifics. It did not appear that lead was used in this facility. The molds and cores for the casts are made with sand. Two types of molds are used; shell or Airset. Three types of cores can be made; shell, Isocure, or air set. Each type of mold and core is made using a different method. Each method is specifically used to correlate permeability, set time, and grain fineness of the sand to the type and temperature of the metal alloy that will be poured into the mold.

The furnaces used at this facility are coreless induction furnaces, which use eddy currents to heat the metal and do not purify with oxygen like electric arc furnaces. It is more efficient to melt

larger pieces of metal in these furnaces than it is to melt bits and scraps. Prior to 2011, Castalloy used to send all of the scrap metal generated at the facility and from customer returns to scrap yards for direct reuse in other foundries. This meant that Castalloy would need to purchase additional feedstock for its own processes and make each alloy recipe from scratch. In 2011, Castalloy began sending its own scrap metal to be treated at a facility with an argon oxygen decarburization (AOD) furnace. The AOD oxidizes the metal to refine it and remove any tramp elements such as hydrogen, tin, and nitrogen. The refined metal is cast into 15-pound ingots and is sent back to Castalloy. According to Mr. Mullikin, there are no tolling agreements or contracts for this work. By sending scrap metal off to the AOD, Castalloy realizes at least three benefits: they get to use alloys that more closely resemble (or are identical to) what they blend on a daily basis; they do not have to purchase as much feed stock; and, the larger mass of metal in 15-pound ingot form burns more efficiently in the induction furnaces.

Incidentally, because Castalloy is sending the scrap metal off-site for processing prior to receiving the metal back, this material is considered by Castalloy to be reclaimed. Each shipment of chromium-containing alloy sent to an AOD facility is now included on their TRI report. Because of this action, the TRI report shows releases of chromium that jumped from nearly zero to more than 34,000 pounds in 2011. Castalloy sent approximately 119,000 pounds to the AOD in 2013 which contained an estimated 20%, or 23,800 pounds, of chromium. They reported 23,828 total chromium released in 2013.

Castalloy can be considered a job shop or boutique, meaning that they do small customized orders. Typical pours range from ounces up to 500 pounds. The largest crucibles and ladles in the facility hold 750 pounds.

The molds for the casts are formed around customer-designed patterns and are made using silica sand, some of which is pre-coated with bonding agents. Shell molds and cores are made with pre-coated sand that is set using only heat. Air set molds and cores start with un-coated sand that is mixed in-house with a two part binder that creates a resin. The resin is set with a chemical catalyst, which sets slowly. The "Isocure" method is used only for cores and also uses un-coated sands mixed with a two part binder, but then the sand is injected with isocyanate gas as the catalyst for a nearly instantaneous set.

Mold and core sand is recycled in-house by being processed through a mechanical classifier, which is an elevator tower that has a series of screens to separate the sand by grain size. The fines from this process are landfilled as non-hazardous waste. The remaining sand is either directly reused on site or is processed through a thermal reclamation unit. The thermal reclamation unit burns off the remaining volatiles from the sand so that it can also reused on site. All sand is stored in three silos. One holds mechanically separated sand; the second holds thermally reclaimed sand; and the third holds new sand.

The alloys themselves are created according to recipe cards. The operator calculates the weight of each component necessary per combination based on known percentages of elements in the feedstock. The charges are placed into the furnaces, which operate during the night shift. Each heat is checked with spectroscopy to ensure proper mixing ratios. The molten metal is poured into the molds through gate assemblies. When the cast cools, the molds are broken off, often

with sledgehammers, and the gates are cut off using arc air or plasma cutters. The rough cast is smoothed in a sand blasting unit and also manually with grinders. The finished product is inspected and shipped off-site.

Wastes generated at this facility include dust and swarf from grinding, welding, and cutting. Welding and cutting wastes are collected as hazardous waste, whereas the grinding dust is managed as non-hazardous. Floor sweepings, shot blast, and sand fines are collected as non-hazardous waste. The Isocure process uses a scrubber for air emissions. The scrubber beads and water have been determined to be non-hazardous. The furnaces use a closed-loop, non-contact cooling water system. This water is never discharged and is only added to for make-up of evaporative losses. Used oil is collected for recycling as are universal waste lamps and batteries.

Site Tour

Mr. Mullikin and Ms. Hunkins accompanied me on a tour of the facility. Castalloy uses the warehouse of the Wheelabrator site across Industrial Lane as a storage area for spill metal and miscellaneous parts. Castalloy provides cast components for Wheelabrator as a trade-off. It was not made clear during the inspection of any other monetary or rental/lease agreement between the two companies for use of this space. The inspection began in this warehouse. Mr. Mullikin explained that the spill metal is categorized by batch so that the alloy composition is tracked for each yard box of scrap before it goes off-site for reclamation in the AOD. Also in this area were yard boxes of returned ingots which will be used as feed stock at the Castalloy facility. Hazardous waste was not observed in this area.

The tour of the Castalloy facility began in the northwest corner and worked toward the southeast portion of the facility. I observed a diamond wheel grinding robot. The material that was being finished was a high-carbon steel. At 68% carbon, the steel was so hard that ordinary grinding material was insufficient. The dust from this operation was being collected in an adjacent baghouse, which emptied into a 55-gallon drum. The drum was not labeled. Mr. Mullikin stated that the material would not cause an air hazard to the employees because it was operated by an automated system. So the waste was not being managed as hazardous. Mr. Mullikin also stated that most particulates in the facility are directly landfilled.

From this area we could see the general welding area which was behind curtains. Mr. Mullikin stated that the waste collected in the baghouse for the welding area is managed as hazardous waste. I did not observe the drum collecting this waste.

The inspection continued through the grinding/finishing area to the maintenance area that was located at the middle of the east side of the facility. Mr. Jahnke pointed out the collected universal waste lamps, which were kept in several 4-foot boxes on the third tier of a storage rack. Mr. Jahnke stated that the containers were not marked. I observed that each box was closed (See Appendix A: Photograph 1). In the same area, but on the ground level, Mr. Jahnke pointed out a 250-gallon tank for used oil. The tank was labeled as "Used Oil" (See Appendix A: Photograph 2). No other waste was observed in this area. No other containers of used oil were observed throughout the facility.

The south end of the facility houses production. I observed the arc air and plasma cutting equipment. Scraps and dust had collected on and around the work table (See Appendix A: Photograph 3). The bag house collectors attached to the equipment funneled into two separate 55-gallon drums. Each drum was labeled as "Hazardous Waste" (See Appendix A: Photographs 4-6). The shot blasting unit was directly behind the cutters. The shot is reused on-site until it is too fine. The fines are sent off-site as non-hazardous waste.

I next observed the mold and core-making operations. The binder used in the sand contains formaldehyde which off-gases when exposed to heat. The operators in this area have to wear respirators. The operators fill a rectangular box with loose sand to make one half of a mold. Sand that is wasted from this part of the operation is sent to a landfill. Half of a pattern is placed into the sand, and, depending on the procedure, the mold is either heated (shell process) or set with a chemical catalyst (air set process). The pattern is then removed from the sand, and the hardened mold is fitted with cores as needed. The cores are made in a separate room. In this room, I noticed the scrubber for the Isocure process. The pellets and liquid from the scrubber are managed as non-hazardous waste. After one half of the mold is fitted with the cores, the matching halves of the mold are placed one on top of the other by robot. Hazardous waste was not being managed in these areas.

The inspection continued to the alloy-charging station. Mr. Mullikin explained how the recipe cards are used by the blending operators and where the blend is staged before being charged in the furnaces. North of the charging station was the thermal reclamation unit for the sand. West of the area are the ladles and crucibles. I did not observe these, as they were shrouded at the time of the inspection and were not operating. This part of the process operates at night. Near this area I observed the cooling deck for the casts as well as the classifier tower for the spent sand. Hazardous waste containers were not observed in any of these areas.

End of Tour

Records and Emergency Preparedness Review – Small Quantity Generator

Preparedness and Prevention: The facility is equipped with telephones, internal announcement systems, fire extinguishers, spill control equipment, and decontamination equipment. The facility is not sprinkled due to the fact that it is a foundry and molten/extremely heated metals react violently with water. The emergency equipment is tested and inspected according to a facility safety schedule. Emergency arrangements have been made with the LEPC which includes the local fire and police departments. Castalloy has an existing emergency response contract with AAA Environmental Response Company. Waukesha Memorial has not been familiarized with the potential injuries that could be incurred by employees at this facility. Aisle space appeared adequate throughout the facility.

Manifests: Manifests, land disposal restriction notices and other shipping records were not immediately available for review, and will be requested post-inspection.

Training: At the time of the inspection, it did not appear that the Castalloy employees had a working knowledge of RCRA and may not have been trained in hazardous waste

management practices. Bryan Burton, HR Manager, and John Braatz were identified during the inspection as being the primary and alternate emergency coordinators, respectively.

Emergency Posting by Phone: A posting by the phone in Ms. Hunkins office showed the layout of the facility along with a list of available emergency equipment. The locations of the emergency equipment were not included. She also had a posting that included contact information for the fire department. The emergency coordinators phone numbers were also on this posting, however, they were not identified as the emergency coordinators.

Waste Determinations: According to the information gathered during the inspection, all waste determinations have been made using generator knowledge. The accuracy of the determinations will be further discussed with Castalloy.

Weekly Inspections: Castalloy does not maintain a regular hazardous waste storage area. According to the consultant, waste that is removed from the satellite accumulation areas is staged for less than three days near the equipment where they were generated.

Closing Conference

During the closing conference with the Mr. Mullikin, I discussed my observations noted during the inspection and asked some outstanding questions from the inspection checklists. I informed Mr. Mullikin that I would be generating a report that included a letter, narrative discussion of the CEI and attendant photographs and checklists. Any response needed from Castalloy according to the letter would be expected within 30 days. I provided three informational handouts: *SHWEC Environmental Programs (WDNR brochure); P2 Technical Assistance Contacts; and U.S. EPA Small Business Resources.*

The following items were discussed with Mr. Mullikin at the close of the inspection.

- I would be requesting any analytical data that they may have on file for the wastes generated at this facility;
- I would be requesting all shipping documents including hazardous waste manifests, land disposal restriction forms, and bills of lading for universal waste and used oil.
- Universal waste labeling;
- Information discussed and collected throughout the inspection was not claimed as confidential business information.

Appendicies

Appendix A: Photograph Log
Appendix B: WDNR Small Quantity Generator Checklist
WDNR Universal Waste Handler Inspection Report – Small Quantity Handler
Appendix C: Post-inspection information requested and received from the facility (updated after approval of this inspection report).

Appendix A

Photograph Log

Inspection Date:
May 20, 2015

Facility Name and ID Number:
Castalloy Company
EPA ID: WID056068802

Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

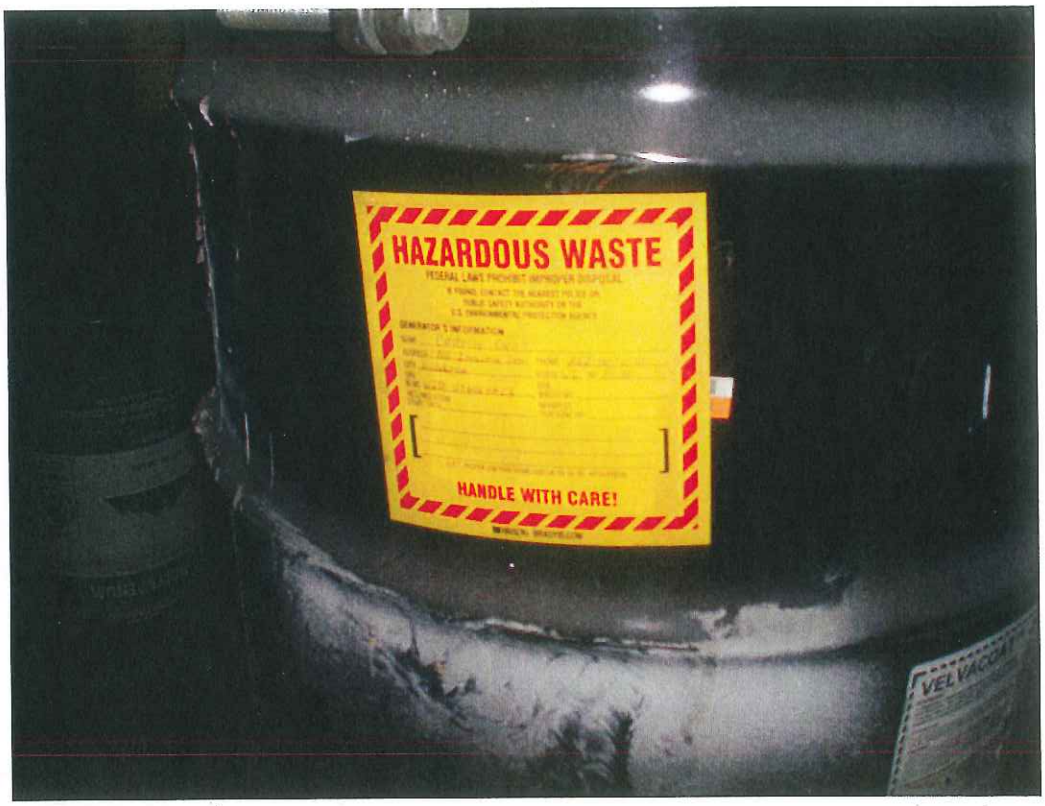
Camera Used:
Olympus Stylus 600
Serial Number: A47525904

Photograph 1 – Several boxes of universal waste lamps were stored on the third riser of a stock storage unit. The containers were each closed but were not marked.

Photograph 2 – A 250-gallon tank of used oil was located on the ground level of the storage unit identified in Photograph 1, above. The tank was marked as "Used Oil."

Photograph 3 – Metal scraps and dust had collected on and around a table that was used in the electric arc air and plasma cutter area.

Photograph 4 – Two baghouses collect dust from the cutting operation. The waste was being managed as hazardous.



Photograph 5 – This photograph is a close-up of the "Hazardous Waste" label affixed to the left-most container identified in Photograph 4, above.

Photograph 6 – This photograph is a close-up of the "Hazardous Waste" label affixed to the right-most container identified in Photograph 4, above.

Appendix B

Checklists

Inspection Date:
May 20, 2015

Facility Name and ID Number:
Castalloy Corporation
WID056068802

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month , evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011). Generator knowledge.	Y	662.190(2) Photo☐
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)). To Be Determined	UN	662.190(2) Photo☐
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1).	N/A	662.190(2) Photo☐
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	ND	662.193(1)(b) Photo☐
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012). Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.190(2) Photo☐

Analysis for Electric Arc

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	No	Photo☐
B. Type of waste and frequency of shipments are specified in the contractual agreement.	N/A	662.191(1)(a) Photo☐
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer.	N/A	662.191(1)(b) Photo☐
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.	N/A	662.191(2) Photo☐
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	N/A	Photo☐
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1).	N/A	662.190(2)(a) Photo☐
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR662.020(2)).	N/A	662.190(2)(a) Photo☐
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	N/A	662.190(2)(a) Photo☐
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	N/A	662.190(2)(a) Photo☐
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	N/A	662.192(5) Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

MANIFEST NOT AVAILABLE FOR REVIEW DURING INSPECTION (EMPLOYEE OUT OF OFFICE)

K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.192(5) Photo☐
L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	UN	662.193(1)(a) Photo☐
M. Copy of each manifest is kept for at least three years from the date of shipment.	UN	662.193(1)(a) Photo☐
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030).	Y	662.190.(2) Photo☐
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031). ACCORDING TO FACILITY REP	Y	662.190(2) Photo☐
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)). ACCORDING TO FACILITY REP	Y	662.190(2) Photo☐
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)).	Y	662.190(2) Photo☐
R. Placards are offered to the initial transporter (NR 662.033). DO NOT SHIP W/O PROPER PLACARDS	Y	662.190(2) Photo☐

Section 3: Land Disposal Restrictions

NO LDR FORMS AVAILABLE FOR REVIEW (RESPONSIBLE EMPLOYEE OUT OF OFFICE)

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	UN	668.07(1) Photo☐
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo☐
C.A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	UN	668.07(1) Photo☐
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	N/A	668.07(1) Photo☐
E. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	N/A	668.07(1) Photo☐
F. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	UN	668.07(1) Photo☐
G. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	UN	668.07(1)(h) Photo☐

Section 3: Land Disposal Restrictions

H. Generator with a contractual agreement complies with BOTH of the following: 1. The notification and certification requirements for the initial shipment of the waste subject to the agreement. 2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.	N/A	668.07(1)(j) Photo☐
I. Underlying hazardous constituents have been identified for characteristic wastes.	UN	668.09(1) Photo☐
J. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code. 2. The treatment standards for all applicable listed and characteristic waste codes.	UN	668.09(2) Photo☐
K. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)): 1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.192(1)(d) Photo☐

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.	Y	662.193(3) Photo☐
B. Copy of each annual report is kept for at least 3 years from the due date of the report.	Y	662.193(1)(c) Photo☐
C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.	N/A	662.193(2) Photo☐

Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032): (1) Device to summon emergency assistance (e.g., telephone, 2 way radio). (2) Internal communications and alarm systems. (3) Portable fire extinguishers. (4) Fire control equipment, including special extinguishing equipment. (sand) (5) Spill control equipment. for binder (petroleum distillates in binder) (6) Decontamination equipment (e.g., eyewash, shower). N/A (7) Water at adequate volume and pressure to supply water spray systems.	Y	662.192(1)(d) Photo☐
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033).	Y	662.192(1)(d) Photo☐
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034).	Y	662.192(1)(d) Photo☐

SMALL QUANTITY GENERATOR INSPECTION

Section 5: Preparedness and Prevention

D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. Walk through with FD., Police/part of security. ERP developed for LEPC 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. through SPCC. 3. Agreements are made with emergency response contractors and equipment suppliers. AAA Environmental Response Co. 4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses. Waukesha Memorial.	Y	662.192(1)(d) Photo☐
E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.192(1)(d) Photo☐

Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time.	Y	662.192(1)(e)1 Photo☐
B. ALL of the following information is posted next to the telephone: 1. Name and telephone number of the emergency coordinator. 2. Location of fire extinguishers, spill control material and, if ~~present, fire alarm~~. 3. Telephone number of the fire department unless the generator has a direct alarm.	N	662.192(1)(e)2 Photo☐
C. In the event of an emergency, the emergency coordinator takes the following actions: 1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706. 2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate. 3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil. 4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802). Emergency Coordinator Brian.	Y	662.192(1)(e)4 Photo☐
D. All employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.	Y	662.192(1)(e)3 Photo☐

Section 7: Container Accumulation

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8. No. 180 day Accumulation area Staged by Collector.	N	 Photo☐
B. The accumulation start date is clearly marked and visible for inspection on each container.	N/A	662.192(1)(d)1 Photo☐
C. All containers are clearly marked with the words "Hazardous Waste".	N/A	662.192(1)(d)2 Photo☐
D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	N/A	662.192(1)(b) Photo☐

Section 7: Container Accumulation

E. Containers are made or lined with materials compatible with the waste (NR 665.0172).	N/A	662.192(1)(b) Photo☐
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N/A	662.192(1)(b) Photo☐
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	N/A	662.192(1)(b) Photo☐
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	N/A	662.192(1)(b) Photo☐
I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.192(1)(b) Photo☐
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.192(1)(b) Photo☐
K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.192(1)(b) Photo☐

Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9.	Y	Photo☐
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.192(4)(a) Photo☐
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.192(4)(a) Photo☐
D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.192(4)(a)1 Photo☐
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.192(4)(a)1 Photo☐
F. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.192(4)(a)2 Photo☐
G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171).	N/A	662.192(4)(a)1 Photo☐
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N/A	662.192(4)(b) Photo☐

According to Facility, Waste out within 3 days of leaving satellite.

SMALL QUANTITY GENERATOR INSPECTION

Section 8: Satellite Accumulation

I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	N/A	662.192(4)(b) Photo☐

Section 9: Used Oil

No Halogens on-site. Who takes oil?

A. Used oil is managed on-site. If NO, go to Section 10.	Y	Photo☐
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N/A	679.10(2)(a)2 Photo☐
C. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2) Photo☐
D. Used oil containers and tanks are marked "used oil".	Y	679.22(3)(a) Photo☐
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	UN	679.24 Photo☐
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	Y	Photo☐
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23 Photo☐
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11 Photo☐

Section 10: Waste Minimization Certification

A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)).	Y	662.190(2)(a) Photo☐

Section 11: Generator Status Evaluation

A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month. FROM INFORMATION GATHERED DURING INSPECTION	Y	662.190(1) Photo☐
B. Waste is accumulated for 180 days or less.	N/A	662.192(1) Photo☐
C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.	N/A	662.192(2) Photo☐

Section 11: Generator Status Evaluation

D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.	Y	662.192(1)(a) Photo ☐
E. Describe any other activities the generator is conducting at the facility.		 Photo ☐

UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANITY HANDLER

Revision: 03/27/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	Y	673.11(1) Photo☐
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.11(2) Photo☐

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N/A	673.13 Photo☐
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N/A	673.13 Photo☐
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	N/A	673.13(1)(b) Photo☐
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	N/A	673.13 Photo☐
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	N/A	673.13(3)(b) Photo☐
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	N/A	673.13(2) Photo☐
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	N/A	673.13(2) Photo☐
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N	673.14 Photo☐
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	N/A	673.14 Photo☐
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	UN	673.15(3) Photo☐
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	UN	673.15(1) Photo☐

UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANITY HANDLER

Revision: 03/27/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2) Photo☐
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	N	673.16 Photo☐
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	N/A	673.17 Photo☐

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.18(1) Photo☐
B. Handler that self-transports complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	N/A	673.18(2) Photo☐
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180. According to Facility Rep.	Y	673.18(3) Photo☐
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	Y	673.18(4) Photo☐
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	N/A	673.18 Photo☐
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	N/A	673.18(7) Photo☐
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	N/A	673.18(8) Photo☐

Appendix C

Post-Inspection Information

Inspection Date:
May 20, 2015

Facility Name and ID Number:
Castalloy Corporation
WID056068802

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Whitney, Brenda

From: Burton, Bryan <Bryan.Burton@noricangroup.com>
Sent: Wednesday, June 24, 2015 12:01 PM
To: Whitney, Brenda
Cc: Mullikin, Morgan; Hunkins, Katlin; 'Liello, Joseph'
Subject: US EPA inspection at Castalloy - May 20, 2015
Attachments: HW Manifests 2012-2015.pdf; LDR - Chromium Waste.pdf; Castalloy - Waste Summary Table 2015-06-19.pdf; Castalloy_51833757_8.19.2010.pdf; Weld Dust_Haz Waste Label.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Whitney,

Attached to this email is the information you requested in your email of June 3, 2015 following the inspection at the Castalloy facility on May 20th. Below is a response to each of your requests:

1. Please provide all manifests for shipments of hazardous waste for the past three years (May 2012 through May 2015). You need only include the final copy which has been signed by the receiving facility.

   I have attached all manifests for shipments of hazardous waste for the past three years (May 2012 through May 2015).

2. If not clearly stated on the manifests provided in response to Item 1, above, please indicate the following
   a. The source of the waste streams (by line item)
   b. The disposition of the waste stream (e.g. landfill, recycle, etc.)

   The waste streams are stated on the manifests, but to clarify, the bag house dust and the bag house filter cartridges (also referenced as 'Arc Air / Plasma Fume Collector'), as referenced in Section 14 on the manifests, are from the Air Arc process. The Safety Kleen solvent (i.e., identified as 'Waste Combustible Liquid' in section 9 of the manifests) is the spent solvent from the parts washer from our maintenance department.

3. Provide Land Disposal Restriction (LDR) forms for each hazardous waste (only one form needed per waste stream) sent off-site for disposal. You do not need to include LDRs for wastes that have not been sent off site in over three years.

   The Safety Kleen waste manifest come with an LDR attached to each one. I have also attached the LDRs for the chromium waste from the Arc Air process, which accompanied the first shipment of each of the two associated waste streams (i.e., baghouse dust and filter cartridges).

4. Hazardous waste determinations must be made for all solid wastes generated at your facility [see, 40 CFR 262.11]. Generator knowledge may be used to make determinations. A generator may also use sample analyses, such as the Toxicity Characteristic Leaching Procedure (TCLP), in order to make the determinations. All determinations must be supported with written documentation [see, 40 CFR 262.40(c)]. Provide waste determination documentation for the following waste streams:
   a. Grinding Swarf
   b. Cutter dust (from the electric arc air cutter and plasma cutter)
   c. Dust collected in the welding area
   d. Floor sweepings
   e. Sand fines
   f. Shot blast fines

g. Parts washer solvent (if applicable)

I have attached a spreadsheet to detail this information for you on the hazardous waste determinations.

5. Provide transporter and receiving facility information for used oil generated on the site. Include the name and EPA ID number of both entities. Also indicate whether the oil is going to be reprocessed, burned, or otherwise.

   This is also detailed on the attached spreadsheet, as also indicated on the respective manifests.

6. For used oil, provide one or more of the following, as applicable:
   a. the total halogen analytical results;
   b. information documenting whether or not used oil is mixed with listed hazardous waste (e.g., a chlorinated solvent) if total halogens exceed 1,000 ppm.

   Safety Kleen field screens the used oil using Chlor-D-Tect test kit. I have included a copy of the documentation received from Safety Kleen regarding the determination of the total halogen analytical results from the last shipment, which indicates that the resulting halogen content was "PASS < 1000" (Castalloy 51833757 8.19.2010.pdf).

7. Provide a photograph of the container (with label, if applicable) used for collecting baghouse dust in the welding area. Also state which processes contribute wastes to this baghouse.

   Photograph attached of the satellite accumulation container used to collect baghouse dust in the welding area. Welding is the only process that contributes wastes to this baghouse.

Regarding the history of the arc air / plasma cutting operation, the cartridge collector was installed in 2010 to improve indoor air quality and reduce the potential for worker exposure, and commenced operation in September 2010. Waste Management is our primary waste contractor, but is only able to handle non-hazardous wastes; therefore, Waste Management coordinates the profiling and disposal of hazardous wastes via Badger Disposal of WI Inc. (Badger).

After the collector first started operation, a non-hazardous waste profile was preliminarily established with the assistance of Badger in 2010 prior to any shipments of the associated wastes, until appropriate characterization testing could be conducted. In December 2010, a sample of the dust that had accumulated was analyzed (TCLP) and determined to be characteristically hazardous due to toxicity for chromium (D007), as documented in an Environmental Monitoring and Technologies, Inc. report (January 6, 2011) that was coordinated by Badger. Based on this information, two new hazardous waste profiles were set-up, including one for the baghouse dust and one for the filter cartridges. The following is a summary of the profiles, which are also referenced in Section 14 of corresponding manifests:

1. WS024235, Arc Air / Plasma Fume Collector [Non-Hazardous - 2010]
2. WS025564, Bag House Dust filter cartridges ERG#171 [Hazardous (D007) – 2011]
3. WS024861, Bag House Dust ERG#171 [Hazardous (D007) – 2011]

Since commencing operation, the majority of the arc air / plasma fume collector waste has been shipped out under either of the two hazardous waste profiles listed above, for the respective waste. However, over this time there were three shipments of arc air / plasma fume collector related waste (2 drums per shipment) that were incorrectly assigned the non-hazardous waste profile number when Waste Management coordinated with Badger for waste pick-up. Consequently, the wastes were inadvertently shipped offsite under non-hazardous waste manifests, namely: 1) Waste Tracking No. 121103 (12-11-2013); 2) Waste Tracking No. 030318 (03-03-2015); and 3) Waste Tracking No. 050120 (05-01-2015).

To resolve this matter, Castalloy has contacted both Waste Management and Badger Disposal, and we have directed Badger to deactivate the non-hazardous waste profile so that it is no longer available -- leaving only the hazardous waste profiles to be pre-printed on manifests that they issue when scheduling a pick-up. Internally, we are also in the process of coordinating appropriate instruction to those responsible for signing manifests to reiterate that wastes characterized as hazardous can only be shipped as a hazardous waste using a uniform hazardous waste manifest. Otherwise, the manifest cannot be signed and the waste must remain onsite until the appropriate manifest shipping documentation is obtained, which properly identifies the waste as hazardous. We are confident that these measures are appropriate and will effectively resolve this matter.

After reviewing the attached information, please advise if you need anything further.

Regards,

Bryan Burton
Director of Human Resources/HS&E, North America
Castalloy, Inc.

Tel: 262-547-0070 x6124
Fax: 262-436-1753
Mobile: 262-751-6812
Web: www.castalloycorp.com

From: Whitney, Brenda [mailto:whitney.brenda@epa.gov]
Sent: Wednesday, June 03, 2015 10:50 AM
To: Mullikin, Morgan
Subject: FW: Re: US EPA inspection at Castalloy - May 20, 2015

Dear Mr. Mullikin,

Thank you for your time and patience during the inspection at your facility on May 20th. I have drafted the inspection report, but have some outstanding questions and requests for you. If possible, please respond to this email no later than June 17, 2015. You may respond electronically, or if you prefer, you may send hard copies in the mail. My mailing information is included at the bottom of this email in case you misplaced my card.

1. Please provide all manifests for shipments of hazardous waste for the past three years (May 2012 through May 2015). You need only include the final copy which has been signed by the receiving facility.

2. If not clearly stated on the manifests provided in response to Item 1, above, please indicate the following
    a. The source of the waste streams (by line item)
    b. The disposition of the waste stream (e.g. landfill, recycle, etc.)

3. Provide Land Disposal Restriction (LDR) forms for each hazardous waste (only one form needed per waste stream) sent off-site for disposal. You do not need to include LDRs for wastes that have not been sent off site in over three years.

4. Hazardous waste determinations must be made for all solid wastes generated at your facility [see, 40 CFR 262.11]. Generator knowledge may be used to make determinations. A generator may also use sample analyses, such as the Toxicity Characteristic Leaching Procedure (TCLP), in order to make the determinations. All determinations must be supported with written documentation [see, 40 CFR 262.40(c)]. Provide waste determination documentation for the following waste streams:
    a. Grinding Swarf
    b. Cutter dust (from the electric arc air cutter and plasma cutter)
    c. Dust collected in the welding area

d. Floor sweepings
e. Sand fines
f. Shot blast fines
g. Parts washer solvent (if applicable)

5. Provide transporter and receiving facility information for used oil generated on the site. Include the name and EPA ID number of both entities. Also indicate whether the oil is going to be reprocessed, burned, or otherwise.

6. For used oil, provide one or more of the following, as applicable:
   a. the total halogen analytical results;
   b. information documenting whether or not used oil is mixed with listed hazardous waste (e.g., a chlorinated solvent) if total halogens exceed 1,000 ppm.

7. Provide a photograph of the container (with label, if applicable) used for collecting baghouse dust in the welding area. Also state which processes contribute wastes to this baghouse.

Thank you for your attention to this matter. Please contact me if you have any questions, or if you need clarification on any of my requests.

Sincerely,
Brenda

Brenda Whitney
Environmental Engineer
U.S. EPA - Region 5
77 W. Jackson Boulevard, LR-8J
Chicago, Illinois 60604
312-353-4796 (ph)
312-385-5505 (fax)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: W I D 0 5 6 0 6 8 8 0 2
2. Page 1 of: 1
3. Emergency Response Phone: 414-236-1083
4. Manifest Tracking Number: 001687169 GBF

5. Generator's Name and Mailing Address: Cast Alloy, 1701 Industrial Lane, Waukesha WI 53189 — Att: Terry Jahnke
Generator's Site Address (if different than mailing address)
Generator's Phone: 2 6 2 5 4 7 - 0 0 7 0

6. Transporter 1 Company Name: Badger Disposal of WI., Inc. — U.S. EPA ID Number: W I D 9 8 8 5 8 0 0 5 6
7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc., 5611 West Hemlock Street, Milwaukee WI 53223 — W I D 9 8 8 5 8 0 0 5 6
Facility's Phone: 414 760-9175

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1 RQ NA3077, Hazardous waste, solid, n.o.s. (Chromium) 9, PGIII	1	DM BF	210 # 55	G	D007		
X	2 RQ NA3077, Hazardous waste, solid, n.o.s.(Chromium) 9, PGIII	1	CF	215	P	D007		
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1)(S,E) WS024861, Bag House Dust ERG#171 2)(S,E) WS025564, Bag House Dust filter cartridges ERG#171 Emergency Contact: Badger Disposal

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: William McCoy — Signature: [redacted] — Month 12 Day 10 Year 12

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. — Port of entry/exit: — Transporter signature (for exports only): — Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: [redacted] — Signature: [redacted] — Month 12 Day 10 Year 12

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Sarah Wetsel — Signature: [redacted] — Month 12 Day 13 Year 12

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: W I D 0 5 6 0 6 8 8 0 2
2. Page 1 of: 1
3. Emergency Response Phone: 414-236-1083
4. Manifest Tracking Number: 001687626 GBF

5. Generator's Name and Mailing Address: Cast Alloy, 1701 Industrial Lane, Waukesha WI 53189 — Att: Terry Jahnke
Generator's Site Address (if different than mailing address)
Generator's Phone: 2 6 2 5 4 7 - 0 0 7 0

6. Transporter 1 Company Name: Badger Disposal of WI., Inc. — U.S. EPA ID Number: W I D 9 8 8 5 8 0 0 5 6
7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc., 5611 West Hemlock Street, Milwaukee WI 53223 — W I D 9 8 8 5 8 0 0 5 6
Facility's Phone: 414 760-9175

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1 RQ NA3077, Hazardous waste, solid, n.o.s. (Chromium) 9, PGIII	1	DM	230# 55	G	D007		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1)(S,E) WS024861, Bag House Dust ERG#171 Emergency Contact: Badger Disposal

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: MAUREEN Kipp — Signature: [redacted] — Month 5 Day 4 Year 12

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. — Port of entry/exit: — Transporter signature (for exports only): — Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Mike Andersen — Signature: [redacted] — Month 5 Day 4 Year 12

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Sarah Wetsel — Signature: [redacted] — Month 5 Day 4 Year 12

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WI D 0 5 6 0 6 6 8 0 2
2. Page 1 of: 1
3. Emergency Response Phone: 414-236-1083
4. Manifest Tracking Number: 001686798 GBF

5. Generator's Name and Mailing Address: Cast Alloy, 1701 Industrial Lane, Waukesha WI 53189 — Attn: Terry Jahnke
Generator's Site Address (if different than mailing address)
Generator's Phone: 262 547-0070

6. Transporter 1 Company Name: Badger Disposal of WI, Inc. — U.S. EPA ID Number: WI D 9 8 6 5 8 0 0 5 6

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc., 5611 West Hemlock Street, Milwaukee WI 53223 — U.S. EPA ID Number: WI D 9 8 6 5 8 0 0 5 6
Facility's Phone: 414 760-9176

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers: No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ NA3077, Hazardous waste, solid, n.o.s. (Chromium) 9, PGIII	1	DM	55	G	D007		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1(S,E) WS024861, Bag House Dust ERG#171 Emergency Contact: Badger Disposal

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: M Gomez — Signature: M Gomez — Month: 7 Day: 13 Year: 12

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Mike Parmeyer — Signature — Month: 7 Day: 13 Year: 12
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space: ☒ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Gerald Ketzler — Signature: Gerald Ketzler — Month: 7 Day: 16 Year: 12

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WI D 0 5 6 0 6 6 8 0 2
2. Page 1 of: 1
3. Emergency Response Phone: 414-236-1083
4. Manifest Tracking Number: 001983427 GBF

5. Generator's Name and Mailing Address: Cast Alloy, 1701 Industrial Lane, Waukesha WI 53189 — Attn: Terry Jahnke
Generator's Site Address (if different than mailing address)
Generator's Phone: 262 547-0070

6. Transporter 1 Company Name: Badger Disposal of WI, Inc. — U.S. EPA ID Number: WI D 9 8 6 5 8 0 0 5 6

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc., 5611 West Hemlock Street, Milwaukee WI 53223 — U.S. EPA ID Number: WI D 9 8 6 5 8 0 0 5 6
Facility's Phone: 414 760-9176

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers: No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ NA3077, Hazardous waste, solid, n.o.s.(Chromium) 9, PGIII	3	CF	989	P	D007		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1(S,E) WS025564, Bag House Dust filter cartridges ERG#171 Emergency Contact: Badger Disposal 414-236-1083

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: For Sale Mz — Signature — Month: 1 Day: 25 Year: 13

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Mike Parmeyer — Signature — Month: 1 Day: 25 Year: 13
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Raymond Wiemerslage — Signature — Month: 1 Day: 28 Year: 13

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY'S COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: W I D 0 5 6 0 6 8 8 0 2
2. Page 1 of 1
3. Emergency Response Phone: 414-236-1083
4. Manifest Tracking Number: 002167248 GBF

5. Generator's Name and Mailing Address: Cast Alloy, 1701 Industrial Lane, Waukesha WI 53189 — Att: Terry Jahnke

Generator's Site Address (if different than mailing address)

Generator's Phone: 262 547-0070

6. Transporter 1 Company Name: Badger Disposal of WI., Inc. — U.S. EPA ID Number: W I D 9 8 8 5 6 0 0 5 6

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc., 6611 West Hemlock Street, Milwaukee WI 53223 — U.S. EPA ID Number: W I D 9 8 8 5 6 0 0 5 6

Facility's Phone: 414 760-9175

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ NA3077, Hazardous waste, solid, n.o.s. (Chromium) 9, PGIII	002	DM	110	G	D007
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: 1)(S,E) WS024861, Bag House Dust ERG#171 Emergency Contact: Badger Disposal 414-236-1083

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Schultz — Signature — Month 06 Day 07 Year 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MICHAEL SHEPHERD — Signature: [signature] — Month 06 Day 07 Year 13
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Ron Mitchell — Signature: Ron Mitchell — Month 6 Day 10 Year 13

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY'S COPY

RECEIVED

AUG 1 6 2013

7020 SK SHIP# 210763040

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID056068802
2. Page 1 of 1
3. Emergency Response Phone: [illegible]
4. Manifest Tracking Number: 003711965 SKS

5. Generator's Name and Mailing Address: CASTALLOY INC. PO BOX 827 WAUKESHA WI 53187-0827

Generator's Site Address (if different than mailing address)

Generator's Phone: 262-547-0070

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC — U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: SAFETY-KLEEN SYSTEMS, INC. [illegible] WEST AVE WAUKESHA, WI 53187 — U.S. EPA ID Number: [illegible]

Facility's Phone: 262-549-3011

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. NA1993 WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) PGIII DOT-SP11606	01	DM	14	G	D039
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: 150-7020 61367900 237934 201332 [illegible]
1) ERG#128;
24 HR EMERGENCY # 800-468-1760 (SAFETY-KLEEN - 24135)
SK AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Terry Jahnke — Signature: Terry Jahnke — Month 08 Day 13 Year 13

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: [handwritten name] — Signature: [signature] — Month 08 Day 13 Year 13
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: [handwritten name] — Signature: [signature] — Month 08 Day 13 Year 13

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

SAFETY-KLEEN 07/20/2013 PAGE: 1
PLANT: 7020
GENERATOR NAME: CASTALLOY INC.
LDR NOTIFICATION FORM 03:20:05
MANIFEST NO.: 002301468 GBF
OR SALES SERVICE NO.: 61367930
SK Shipping #: 210763840 CUST#: 237936
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A- GENERAL WASTE NOTIFICATION

LDR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01/001 SK PRFL NO.: 0000150055
SKDOT#: 0000717

EPA WASTE CODES & LDR-SUBCATEGORIES (IF ANY):
D039
Treatability group: NNW Non-Waste Water
Waste Constituent Notification:

Legend Number	Constituent
184	METHYL ETHYL KETONE
229	TETRACHLOROETHYLENE
250	CADMIUM
251	CHROMIUM (TOTAL)
255	LEAD
257	MERCURY - ALL OTHERS

NOTES

EXP NOTICE: THIS LDR EXPIRES ON 12/31/2013

Terry Jahnke (signature) — GENERATOR'S AUTHORIZED SIGNATURE
Terry Jahnke — NAME & TITLE (PRINTED OR TYPED)
08/13/13 — DATE

PLANT: 7020 CSG: 22 REF#: 61367930 SW: 201333

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFER

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID058068802
2. Page 1 of 1
3. Emergency Response Phone: 414-236-1083
4. Manifest Tracking Number: 002301468 GBF

5. Generator's Name and Mailing Address: Cast Alloy, 1701 Industrial Lane, Waukesha WI 53189 — Att: Terry Jahnke
Generator's Site Address (if different than mailing address)
Generator's Phone: 262-547-0070

6. Transporter 1 Company Name: Badger Disposal of WI, Inc. — U.S. EPA ID Number: WID988580056
7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc., 5611 West Hemlock Street, Milwaukee WI 53223
Facility's Phone: 414-760-9176 — U.S. EPA ID Number: WID988580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ NA3077, Hazardous waste, solid, n.o.s. (Chromium) 9, PGIII	003	CF	678	P	D007
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1)(S,E) WS025504, Bag House Dust filter cartridges ERG#171 Emergency Contact: Badger Disposal 414-236-1083

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.
Generator's/Offeror's Printed/Typed Name: MAUREEN Kipp — Signature: Maureen Kipp — Month Day Year: 12 23 13

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MICHAEL SHEPHERD — Signature: Michael Shepherd — Month Day Year: 12 23 13
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☒ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: R. Mitchell — Signature: R. Mitchell — Month Day Year: 12 24 13

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY'S COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number | 2. Page 1 of 1 | 3. Emergency Response Phone: 414-236-1083 | 4. Waste Tracking Number: 121103

5. Generator's Name and Mailing Address: Castalloy Corp. 1701 Industrial Lane Waukesha WI 53189 — Att: Bryan Burton or Terry Jahnke
Generator's Site Address (if different than mailing address)
Generator's Phone: 262 647 9974

6. Transporter 1 Company Name: Badger Disposal of WI, Inc. | U.S. EPA ID Number: WIDO88580056

7. Transporter 2 Company Name | U.S. EPA ID Number

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc. 5611 West Hemlock Street Milwaukee WI 53223
Facility's Phone: 414 760 9175 | U.S. EPA ID Number: WIDO88580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. Non-regulated material	002	DM	316	P	NONE
	2.					
	3.					
	4.					

13. Special Handling Instructions and Additional Information
1(S) WS024235, Arc Air/ Plasma Fume Collector Emergency Contact: Badger Disposal 414-236-1083

14. GENERATOR'S CERTIFICATION: I hereby certify that the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.
Generator's/Offeror's Printed/Typed Name: (X) M Gomez | Signature: (X) M Gomez | Month 12 | Day 11 | Year 13

15. International Shipments: ☐ Import to U.S. ☐ Export from U.S. | Port of entry/exit: | Date leaving U.S.:
Transporter signature (for exports only):

16. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MICHAEL SHEPHERD | Signature: Michael Shepherd | Month 12 | Day 11 | Year 13
Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

17. Discrepancy
17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number: | U.S. EPA ID Number

17b. Alternate Facility (or Generator) | U.S. EPA ID Number
Facility's Phone: | Month | Day | Year
17c. Signature of Alternate Facility (or Generator)

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a
Printed/Typed Name: Sarah Webster | Signature: Sarah Webster | Month 12 | Day 11 | Year 13

GENERATOR | TRANSPORTER INTL | TRANSPORTER | DESIGNATED FACILITY

S-HNR-C-11

4-DESIGNATED FACILITY'S COPY

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WIDO58858056 | 2. Page 1 of 1 | 3. Emergency Response Phone: 414-236-1080 | 4. Manifest Tracking Number: 002301953 GBF

5. Generator's Name and Mailing Address: Cast Alloy 1701 Industrial Lane Waukesha, WI 53189 — Att: Terry Jahnke
Generator's Site Address (if different than mailing address)
Generator's Phone: 262 547 0070

6. Transporter 1 Company Name: Badger Disposal of Wi, Inc. | U.S. EPA ID Number: WIDO88580056

7. Transporter 2 Company Name | U.S. EPA ID Number

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc. 5611 West Hemlock Street Milwaukee WI 53223
Facility's Phone: 414 760 9175 | U.S. EPA ID Number: WIDO88580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ NA3077, Hazardous waste, solid, n.o.s.(Chromium), 9, PGIII	003	CF	75.7	P	D007
X	2. RQ NA3077, Hazardous waste, solid, n.o.s. (Chromium), 9, PGIII	002	DM	110	G	D007
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1)(S,E) WS025564, Bag House Dust filter cartridges ERG#171 2)(S,E) WS024881, Bag House Dust ERG#171 Emergency Contact: Badger Disposal 414-236-1080 — 189 LBS / 142 LBS } DM

16. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.
Generator's/Offeror's Printed/Typed Name: (X) M Kuesson Kipp | Signature: (X) Maura Kipp | Month 05 | Day 13 | Year 14

15. International Shipments: ☐ Import to U.S. ☐ Export from U.S. | Port of entry/exit: | Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MICHAEL SHEPHERD | Signature: Michael Shepherd | Month 05 | Day 13 | Year 14
Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number: | U.S. EPA ID Number

18b. Alternate Facility (or Generator)
Facility's Phone: | Month | Day | Year
18c. Signature of Alternate Facility (or Generator)

18. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 | 2. H141 | 3. | 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Raymond Kosmeder | Signature: Raymond Kosmeder | Month 5 | Day 14 | Year 14

GENERATOR | TRANSPORTER INTL | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	WID056066802	1	800-424-9300	002415090 GBF

5. Generator's Name and Mailing Address: Cast Alloy, 1701 Industrial Lane, Watertown WI 53189. Attn: Terry Jahnke. Generator's Site Address (if different than mailing address)
Generator's Phone: 262 547-0070

6. Transporter 1 Company Name: Badger Disposal of WI, Inc. U.S. EPA ID Number: WID988560056

7. Transporter 2 Company Name: U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc., 5611 West Hemlock Street, Milwaukee WI 53223
Facility's Phone: 414 760-9176 U.S. EPA ID Number: WID988560056

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ NA3077, Hazardous waste, solid, n.o.s. (Chromium) 9, PGIII	002	DM	348	P	D007		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1)(S,E) WS024861, Bag House Dust ERG#171 Emergency contact: CHEMTREC, acct # CCN708044

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: MAUREEN RIPP Signature: Maureen Ripp Month: 08 Day: 29 Year: 14

16. International Shipments: Import to U.S. Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MICHAEL SHEPHERD Signature: Michael Shepherd Month: 08 Day: 29 Year: 14
Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:

18. Discrepancy
18a. Discrepancy Indication Space: Quantity Type Residue Partial Rejection Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Raymond Kosmowski Signature: Month: 9 Day: 2 Year: 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY'S COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	WID056066802	1	800-424-9300	002415293 GBF

5. Generator's Name and Mailing Address: Cast Alloy, 1701 Industrial Lane, Watertown WI 53189. Attn: Terry Jahnke. Generator's Site Address (if different than mailing address)
Generator's Phone:

6. Transporter 1 Company Name: Badger Disposal of WI , Inc. U.S. EPA ID Number: WID988560056

7. Transporter 2 Company Name: U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc, 5611 West Hemlock Street, Milwaukee WI 53223
Facility's Phone: U.S. EPA ID Number: WID988560056

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ NA3077, Hazardous waste, solid, n.o.s. (Chromium) 9, PGIII	2	DM	110	G	D007		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1)(S,E) WS024861, Bag House Dust EMERGENCY CHEMTREC ACCT# CCN708044 ERG#171

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: M Gomez Signature: Month: 10 Day: 10 Year: 14

16. International Shipments: Import to U.S. Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Signature: Month: 10 Day: 13 Year: 14
Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:

18. Discrepancy
18a. Discrepancy Indication Space: Quantity Type Residue Partial Rejection Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Raymond Kosmowski Signature: Month: 10 Day: 13 Year: 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

Field	Entry
1. Generator ID Number	W I D 0 5 6 0 8 8 8 0 2
2. Page 1 of	1
3. Emergency Response Phone	800-424-9300
4. Manifest Tracking Number	002652731 GBF

5. Generator's Name and Mailing Address — Att: Terry Janke
Generator's Site Address (if different than mailing address)
Cast Alloy
1701 Industrial Lane
Waukesha WI 53189
Generator's Phone: 262 547-0070

6. Transporter 1 Company Name: Badger Disposal of WI, Inc — U.S. EPA ID Number: W I D 9 8 8 5 8 0 0 5 6

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address — U.S. EPA ID Number: W I D 9 8 8 5 8 0 0 5 6
Badger Disposal of WI Inc.
5611 West Hemlock Street
Milwaukee WI 53223
Facility's Phone: 414 760-9175

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ NA3077 Hazardous waste, solid, n.o.s. (Chromium) 9, PGIII	1	DM	231	P	D007
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1)(S.E) WS024861 Bag House Dust ERG#171 Emergency Contact: CHEMTREC ACCT#CCN708044

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.
Generator's/Offeror's Printed/Typed Name: [signature] Signature: [signature] Month Day Year: 11 13 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Signature: Month Day Year: 11 13 14
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Signature: Month Day Year: 11 14 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

USU SK SHIP# ~~[illegible]~~ 212274591 SKS

004032043SKS

Please print or type. Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

Field	Entry
1. Generator ID Number	[illegible]
2. Page 1 of	1
3. Emergency Response Phone	1-800 [illegible]-1760
4. Manifest Tracking Number	004032043 SKS

5. Generator's Name and Mailing Address
[illegible]
WI 53187-0827
Generator's Phone: 262-547-0070

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC — U.S. EPA ID Number: WID981097769

7. Transporter 2 Company Name

8. Designated Facility Name and Site Address — U.S. EPA ID Number: WID981097769
SAFETY-KLEEN SYSTEMS, INC
[illegible]
WAUKESHA, WI 53187
Facility's Phone: 262-549-0011

9a. HM	9b. U.S. DOT Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. [illegible] (PETROLEUM NAPHTHA) [illegible]	01	DM	14	G	D039
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information [illegible] 58710785 [illegible] 30145 C50:22
1)ERG#128;
24 HR EMERGENCY # 800-468-1760(SAFETY-KLEEN - 94138)
SK AUTHORIZED TO UTILIZE LICENSED SUBSEQUENT CARRIERS AS NECESSARY

15. GENERATOR'S/OFFEROR'S CERTIFICATION: [illegible]
Generator's/Offeror's Printed/Typed Name: MAUREEN Kipp Signature: M. Kipp Month Day Year: [illegible] 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S.

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1: [signature] Month Day Year: [illegible] 14

18. Discrepancy
18a. ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

19. Hazardous Waste Report Management Method Codes

20. Designated Facility Owner or Operator certification — Printed/Typed Name: Signature: Month Day Year: [illegible] 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.
1)717715000US

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

SAFETY-KLEEN 01/04/2014 PAGE: 1
LDR NOTIFICATION FORM 03:46:20

PLANT: WSU
GENERATOR NAME. Castalloy Inc.
MANIFEST NO.: 004294796SKS
OR SALES SERVICE NO. 62713785
CUST#: CA36663

SK Shipping #: 212070374
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01/001 SK PRFL NO.: 0000150055
SKDOT#: 0000717

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D039
Treatability group: NNW Non-Waste Water
Waste Constituent Notification:

Legend Number	Constituent
184	METHYL ETHYL KETONE
229	TETRACHLOROETHYLENE
237	TRICHLOROETHYLENE
250	CADMIUM
251	CHROMIUM (TOTAL)
255	LEAD
257	MERCURY - ALL OTHERS

NOTES
EXP NOTICE THIS LDR EXPIRES ON 12/31/2014

GENERATOR'S AUTHORIZED SIGNATURE — Maureen Kipp — 01/07/14
NAME & TITLE (PRINTED OR TYPED) — DATE

PLANT WSU CSO:82 REF#: 62713785 SW: 20145
TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFER

WSU SK SHIP# 212760360

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID056068802
2. Page 1 of 1
3. Emergency Response Phone: 1-800-468-1760
4. Manifest Tracking Number: 004294796 SKS

5. Generator's Name and Mailing Address:
Castalloy Inc
Po Box 827
Waukesha WI 53187-0827
Generator's Phone: 262-547-0070

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC. — U.S. EPA ID Number: WID981097769

7. Transporter 2 Company Name:

8. Designated Facility Name and Site Address:
SAFETY-KLEEN SYSTEMS, INC
2200 S WEST AVE
WAUKESHA, WI 53189
Facility's Phone: 262-549-3011
U.S. EPA ID Number: WID981097769

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. NA1993 WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) PGIII DOT-SP11606	01	DM	14	G	D039
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: TSD: WAU 63409449 CA36663 201417 CSG:22
1)ERG#128/
24 HR EMERGENCY # 800-468-1760(SAFETY-KLEEN ~ 94138)
SK AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY

15. GENERATOR'S/OFFEROR'S CERTIFICATION: [illegible]
Generator's/Offeror's Printed/Typed Name: Marvin Smith — Signature: Marvin Smith — 01/07/14

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: [illegible] — Signature: [signature] — 01/07/14
Transporter 2 Printed/Typed Name: — Signature:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
18b. Alternate Facility (or Generator) — U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)

19. Hazardous Waste Report Management Method Codes: 1. H141

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Bess Lechmaier — Signature: [signature] — 01/29/14

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)
1)717/150055

SAFETY-KLEEN
LDR NOTIFICATION FORM

03/27/2014 PAGE: 1
01:45:46

PLANT: WSU
GENERATOR NAME: Castalloy Inc.

MANIFEST NO.: 004307202SKS
OR SALES SERVICE NO.: 63409449
CUST#: CA36663

SK Shipping #: 212760360
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01/001 SK PRFL NO.: 0000150055
SKDOT#: 0000717

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY)
D039
Treatability group: NNW Non-Waste Water
Waste Constituent Notification:

Legend Number	Constituent
184	METHYL ETHYL KETONE
229	TETRACHLOROETHYLENE
237	TRICHLOROETHYLENE
250	CADMIUM
251	CHROMIUM (TOTAL)
255	LEAD
257	MERCURY - ALL OTHERS

NOTES

EXP NOTICE: THIS LDR EXPIRES ON 12/31/2014

GENERATOR'S AUTHORIZED SIGNATURE

NAME & TITLE (PRINTED OR TYPED): Macyn Smith Maint.

DATE: 1/14/14

PLANT: WSU
CSO: 22 REF#: 63409449 SW: 201417
TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFER

WSU SK SHIP# 212760360

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID046040802
2. Page 1 of: 1
3. Emergency Response Phone: 1-800-468-1760
4. Manifest Tracking Number: 004307202 SKS

5. Generator's Name and Mailing Address:
Castalloy Inc.
Po Box 827
Waukesha WI 53187-0827
Generator's Phone: 262-547-0070

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC — U.S. EPA ID Number: WID981097769

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address:
SAFETY-KLEEN SYSTEMS, INC
2200 B WEST AVE
WAUKESHA, WI 53189
Facility's Phone: 262-549-2011
U.S. EPA ID Number: WID981097769

9a. HM	9b. U.S. DOT Description	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. NA1993 WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) PGIII DOT-SP11606	01	DM	14	G	D039
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: TSR:WSU

1)ERG#128;
24 HR EMERGENCY # 800-468-1760(SAFETY-KLEEN - 94176)
SK AUTHORIZED TO PLACE LICENSED SUBSEQUENT CARRIER AS NECESSARY

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name: Paul Luedloff — Signature: Paul Luedloff — Month Day Year: 07/14/14

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ray Kaneser — Signature — Month Day Year: 07/14/14
Transporter 2 Printed/Typed Name: — Signature — Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number:

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Brian Lochsmeier — Signature — Month Day Year: 07/14/14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.
171771150055

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: 00453958 SKS

GENERATOR

5. Generator's Name and Mailing Address
Generator's Site Address (if different than mailing address)
Generator's Phone:

6. Transporter 1 Company Name
U.S. EPA ID Number:

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
U.S. EPA ID Number
Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1.	01	DM	11	G			
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name
Signature
Month Day Year

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name
Signature
Month Day Year

Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name
Signature
Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

SAFETY-KLEEN 09/15/2014 PAGE: 1
12:23:42

PLANT: WSU LDR NOTIFICATION FORM

GENERATOR NAME: Castalloy Inc.

MANIFEST NO.: 004619958 SKS

OR SALES SERVICE NO.: 64842539

SK Shipping #: 214158994 CUST#: CA36663

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO : MANIFEST PAGE/LINE# 01/001 SK PRFL NO.: 0000150055

SKDET#: 0000717

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY)

D039

Treatability group: NNW Non-Waste Water

Waste Constituent Notification.

Legend

Number	Constituent
184	METHYL ETHYL KETONE
229	TETRACHLOROETHYLENE
237	TRICHLOROETHYLENE
250	CADMIUM
251	CHROMIUM (TOTAL)
255	LEAD
257	MERCURY - ALL OTHERS

NOTES

EXP NOTICE: THIS LDR EXPIRES ON 12/31/2014

GENERATOR'S AUTHORIZED SIGNATURE

NAME & TITLE (PRINTED OR TYPED)

10, 09, 14

DATE

PLANT WSU

TOP COPY: GENERATOR

CSO: 22 REF#: 64842539 SW: 201441

MIDDLE COPY: FACILITY

BOTTOM COPY: TRANSFER

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID0[illegible]
2. Page 1 of 1
3. Emergency Response Phone: 1-800-[illegible]
4. Manifest Tracking Number: 004619663 SKS

5. Generator's Name and Mailing Address: [illegible] WI [illegible]

Generator's Site Address (if different than mailing address)

Generator's Phone: [illegible]

6. Transporter 1 Company Name: [illegible] SYSTEMS, INC — U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: SAFETY-KLEEN SYSTEMS, INC [illegible] WI 53189 — U.S. EPA ID Number: WID[illegible]

Facility's Phone: [illegible]

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. [illegible] WASTE [illegible] LIQUID, N.O.S. [illegible]	01	[illegible]	14	G	D039
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: [illegible] CA36663 [illegible]

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name — Signature — Month 12 Day 30 Year 14

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name — Signature — Month 12 Day 30 Year 14

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. [illegible] 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month 12 Day 30 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

SAFETY-KLEEN LDR NOTIFICATION FORM 12/09/2014 PAGE: 1 07:09.44

PLANT WSU

GENERATOR NAME Castalloy Inc

MANIFEST NO.: 0016/9663 (R)

OR SALES SERVICE NO. 65612093

CUST#: CA36663

SK-Shipping #: 214869442

"Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO 1 MANIFEST PAGE/LINE# 01/001 SKPRFL NO: 150055

SKDOT#: 0000717

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY)

D00?

Treatability group: NNW Non-waste Water

Waste Constituent Notification

Legend Number	Constituent
186	METHYL ETHYL KETONE
228	TETRACHLOROETHYLENE
237	TRICHLOROETHYLENE
250	CADMIUM
251	CHROMIUM (TOTAL)
255	LEAD
265	SILVER

NOTES

EXP NOTICE: THIS LDR EXPIRES ON 12/31/2015

GENERATOR'S AUTHORIZED SIGNATURE | NAME & TITLE (PRINTED OR TYPED) | 12/30/14 DATE

PLANT: WSU CSG: 22 REF#: 65612093 SW: 20151

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFER

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID058068802
2. Page 1 of 1
3. Emergency Response Phone: 800-424-9300
4. Waste Tracking Number: 060120

5. Generator's Name and Mailing Address: Cast Alloy, 1701 Industrial Lane, Waukesha WI 53189 — Att: Terry Johnke

Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name: Badger Disposal of WI, Inc — U.S. EPA ID Number: WID988580050

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc., 5611 West Hemlock Street, Milwaukee WI 53223 — U.S. EPA ID Number: WID988580050

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	
	1. Non-regulated material	002	DM	110	G	NONE
	2.					
	3.					
	4.					

13. Special Handling Instructions and Additional Information: 1)(S) WS024235, Arc Air Plasma Fume Collector Emergency Contact: CHEMTREC #CCN708044

002

110

14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Generator's/Offeror's Printed/Typed Name: Signature: Month 05 Day 01 Year 15

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S.:

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: MICHAEL SHEPHERD Signature: [signature] Month 05 Day 01 Year 15

Transporter 2 Printed/Typed Name Signature Month Day Year

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator) U.S. EPA ID Number:

Facility's Phone:

17c. Signature of Alternate Facility (or Generator) Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name: Sarah Webster Signature: [signature] Month Day Year

6-NHM-C-C-11

2-DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number

2. Page 1 of 1

3. Emergency Response Phone

4. Manifest Tracking Number 004898185 SKS

5. Generator's Name and Mailing Address

Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name — U.S. EPA ID Number

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address — U.S. EPA ID Number

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1.	01		14		
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name — Signature — Month Day Year

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name — Signature — Month Day Year

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

SAFETY-KLEEN — LDR NOTIFICATION FORM — PAGE 1

PLANT: — MANIFEST NO.

GENERATOR NAME: — SERVICE NO.

CUSTS.

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO. 1 MANIFEST PAGE/LINE# 01/001

EPA Waste Codes & LDR Subcategories (if any):

Treatability group: NWW Non-Waste Water

Waste Constituent Notification:

Legend Number	Constituent
	METHYL ETHYL KETONE
	TETRACHLOROETHYLENE
	TRICHLOROETHYLENE
	CADMIUM
	CHROMIUM (TOTAL)
	LEAD
	SILVER

EXP NOTICE: THIS LDR EXPIRES ON 12/31/2015

GENERATOR'S AUTHORIZED SIGNATURE — NAME & TITLE (PRINTED OR TYPED) — DATE

TOP COPY: GENERATOR — MIDDLE COPY: FACILITY — BOTTOM COPY: TRANSPORTER

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number
	W I D 0 5 6 0 6 8 8 0 2	1	800-424-9300	0 3 0 3 1 8

GENERATOR

5. Generator's Name and Mailing Address — Att: Terry Jahnke
Generator's Site Address (if different than mailing address)

Cast Alloy
1701 Industrial Lane
Waukesha WI 53189

Generator's Phone: 262 547-0070

6. Transporter 1 Company Name: Badger Disposal of WI, Inc. — U.S. EPA ID Number: W I D 9 8 8 5 6 0 0 5 0

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address — U.S. EPA ID Number: W I D 9 8 8 5 6 0 0 5 0

Badger Disposal of WI, Inc.
5611 West Hemlock Street
Milwaukee WI 53223

Facility's Phone: 414 760-0726

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
	1. Non-regulated material	2	DM	110	G	NONE
	2.					
	3.					
	4.					

13. Special Handling Instructions and Additional Information
1)(S) WS0?4235, Arc Air/ Plasma Fume Collector Emergency Contact: CHEMTREC #CCN708044

14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Generator's/Offeror's Printed/Typed Name: Matthew Kipp — Signature: Matthew Kipp — Month 3 Day 2 Year 15

INT'L

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: ____
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: [illegible] — Signature: [illegible] — Month 3 Day 3 Year 15
Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

17. Discrepancy
17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
17b. Alternate Facility (or Generator) — U.S. EPA ID Number:
Facility's Phone:
17c. Signature of Alternate Facility (or Generator) — Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a
Printed/Typed Name: [illegible] — Signature: [illegible] — Month 3 Day 5 Year 15

6-NHM-C-C-11

2-DESIGNATED FACILITY TO GENERATOR

Land Disposal Restriction Notification Form

Facility Site Address

Badger Disposal of WI, Inc.
5611 West Hemlock Street
Milwaukee WI 53223
EPA ID WID988580056

State Manifest Number: 001380259GBF
Federal Manifest Number:

Generator Mail Address

Cast Alloy
1701 Industrial Lane
Waukesha WI 53189
EPA ID WID056068802

Generator Site Address

Cast Alloy
1701 Industrial Lane
Waukesha WI 53189

RECD APR 011

Manifest Line No.: 1 **Certification:** General Certificate

Treatability Group: WW — NWW: X

Profile Name: Bag House Dust Filter Cartridges
Profile Number: WS025564 **Approval Code:** **ApProval Status:**

A. F001 - F005 Solvent Restrictions

This restricted waste category is banned from land disposal under 40 CFR 268.30 and is subject to one or more treatment standards under 40 CFR Subpart D.

EPA Code	Hazardous Constituent	CAS	WW Standard	NWW Standard

B. Other Regulated Waste Notification

This section includes all wastes restricted from land disposal not included in other sections. If any treatment standards reference 40 CFR 268.48, then all underlying hazardous constituents are listed in Section D.

EPA Code	Hazardous Constituent	Waste Description and Treatment/ Regulatory Subcategory	CAS	WW Standard	NWW Standard

C. D001 - D043

If any treatment standards reference 40 CFR 268.48, then all underlying hazardous constituents are listed in Section D.

EPA Code	Hazardous Constituent	Waste Description and Treatment/ Regulatory Subcategory	CAS	WW Standard	NWW Standard
D007	Chromium (Total)	Wastes that exhibit, or are expected to exhibit, the characteristic of toxicity for chromium based on the toxicity characteristic leaching procedure (TCLP) in SW846.	7440-47-3	2.77 and meet §268.48 standards	0.60 mg/l TCLP and meet §268.48 standards

D. Underlying Hazardous Constituents

This section contains the list of all constituents listed in 40 CFR 268.48, Table UTS - Universal Treatment Standards, except vanadium and zinc, which can reasonably be expected to be present at the point of generation of the hazardous waste, at a concentration above the constituent-specific UTS treatment standard.

Hazardous Constituent	WW Standard	NWW Standard

E. Non-Hazardous / Non-Restricted Waste

There are no EPA waste codes that are not subject to land disposal restrictions as specified in 40 CFR Subpart D or applicable prohibitions in 40 CFR 268.32 or RCRA.

I hereby notify that this shipment contains waste restricted under 40 CFR 268, Land Disposal Restrictions. I hereby certify that all information submitted in this and all attached documents is complete, contains true and accurate descriptions and is representative of the waste material, and that all relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.

Signature _____ Date 4/12/11

Land Disposal Restriction Notification Form

Facility Site Address
Badger Disposal of WI, Inc.
5611 West Hemlock Street
Milwaukee WI 53223
EPA ID WID988580056

State Manifest Number: 001380609GBF
Federal Manifest Number:

Generator Mail Address
Cast Alloy
1701 Industrial Lane
Waukesha WI 53189
EPA ID WID056068802

Generator Site Address
Cast Alloy
1701 Industrial Lane
Waukesha WI 53189

Manifest Line No.: 1 **Certification:**

Profile Name: Bag House Dust
Profile Number: WS024861 **Approval Code:** WS024861 **ApProval Status:** Approved

Treatability Group	
WW	NWW
	X

A. F001 - F005 Solvent Restrictions

This restricted waste category is banned from land disposal under 40 CFR 268.30 and is subject to one or more treatment standards under 40 CFR Subpart D.

EPA Code	Hazardous Constituent	CAS	WW Standard	NWW Standard

B. Other Regulated Waste Notification

This section includes all wastes restricted from land disposal not included in other sections. If any treatment standards reference 40 CFR 268.48, then all underlying hazardous constituents are listed in Section D.

EPA Code	Hazardous Constituent	Waste Description and Treatment/ Regulatory Subcategory	CAS	WW Standard	NWW Standard

C. D001 - D043

If any treatment standards reference 40 CFR 268.48, then all underlying hazardous constituents are listed in Section D.

EPA Code	Hazardous Constituent	Waste Description and Treatment/ Regulatory Subcategory	CAS	WW Standard	NWW Standard
D007	Chromium (Total)	Wastes that exhibit, or are expected to exhibit, the characteristic of toxicity for chromium based on the toxicity characteristic leaching procedure (TCLP) in SW846.	7440-47-3	2.77 and meet §268.48 standards	0.60 mg/l TCLP and meet §268.48 standards

D. Underlying Hazardous Constituents

This section contains the list of all constituents listed in 40 CFR 268.48, Table UTS - Universal Treatment Standards, except vanadium and zinc, which can reasonably be expected to be present at the point of generation of the hazardous waste, at a concentration above the constituent-specific UTS treatment standard.

Hazardous Constituent	WW Standard	NWW Standard

E. Non-Hazardous / Non-Restricted Waste

There are no EPA waste codes that are not subject to land disposal restrictions as specified in 40 CFR Subpart D or applicable prohibitions in 40 CFR 268.32 or RCRA.

Signature _____ Date 2/21/11

CASTALLOY, INC. GENERATOR ID: WID056068802

Waste Stream	Process or Source	Characterization[1]			Waste Management[2]			Additional Notes
		Type	Basis	Reference	Transporter(s)	Destination Facility	Fate	
Arc Air Cutting - Dust	Arc Air Cutting	Hazardous Waste D007 - Chromium	Analytical Data - TCLP	Environmental Monitoring & Technologies, Inc., Report Dated 01-06-2011	Badger Disposal of WI, Inc. EPA ID: WID988580056	Badger Disposal of WI, Inc. EPA ID: WID988580056	Stabilization & Landfill	
Arc Air Cutting - Filter	Arc Air Cutting	Hazardous Waste D007 - Chromium	Analytical Data - TCLP	Environmental Monitoring & Technologies, Inc., Report Dated 01-06-2011	Badger Disposal of WI, Inc. EPA ID: WID988580056	Badger Disposal of WI, Inc. EPA ID: WID988580056	Stabilization & Landfill	
Welding Dust	Welding Operations	Hazardous Waste D007 - Chromium	Generator Knowledge	Assumed to be characteristically similar to the arc air cutting dust.	Badger Disposal of WI, Inc. EPA ID: WID988580056	Badger Disposal of WI, Inc. EPA ID: WID988580056	Stabilization & Landfill	Satellite accumulation drum has yet to be filled and shipped.
Grinding Swarf	Grinding Operations	Non-Hazardous	Analytical Data - TCLP for combined Foundry Sand & Blasting, and Generator Knowledge	Environmental Monitoring & Technologies, Inc., Report Dated 04-15-2011	Waste Management EPA ID: WID097339303	Waste Management EPA ID: WID097339303	Landfill	
Floor Sweeings	Housekeeping	Non-Hazardous	Analytical Data - TCLP for combined Foundry Sand & Blasting, and Generator Knowledge	Environmental Monitoring & Technologies, Inc., Report Dated 04-15-2011	Waste Management EPA ID: WID097339303	Waste Management EPA ID: WID097339303	Landfill	
Sand fines	Foundry - Pouring, Cooling, Shakeout	Non-Hazardous	Analytical Data - TCLP for combined Foundry Sand & Blasting, and Generator Knowledge	Environmental Monitoring & Technologies, Inc., Report Dated 04-15-2011	Waste Management EPA ID: WID097339303	Waste Management EPA ID: WID097339303	Landfill	
Shot Blast Fines	Finishing	Non-Hazardous	Analytical Data - TCLP for combined Foundry Sand & Blasting, and Generator Knowledge	Environmental Monitoring & Technologies, Inc., Report Dated 04-15-2011	Waste Management EPA ID: WID097339303	Waste Management EPA ID: WID097339303	Landfill	
Spent Solvent	Maintenance - Parts Washer	Hazardous Waste D039 - Tetrachloroethylene	Analytical Data	Per Ms. Kelly Taylor (Safety-Kleen), SK annually recharacterizes based on statistical sampling of generators.	Safety-Kleen System, Inc. EPA ID: TXR000081205	Safety-Kleen System, Inc. EPA ID: WID981097769	Recovery	Safety-Kleen 150 Premium Recycled Solvent
Used Oil	Maintenance	Used Oil	Analtyical Data (Field screened using Chlor-D-Tect test kit) & Generator Knowledge	Safety-Kleen tests each pick-up (Chlor-D-Tect) for halogens, with result recorded on receipt - normally < 1000 ppm	Safety-Kleen System, Inc. EPA ID: WID117520049	Safety-Kleen System, Inc. EPA ID: WID117520049	Re-Refined	Ensure container labeled as "Used Oil", and managed in accordance with NR 679, WAC.

Notes

1. **Characterization - Type:**
   Non-Hazardous Waste
   Used Oil
   Universal Waste Batteries
   Universal Waste Lamps
   Universal Waste Mercury Thermostats
   Universal Waste Pesticides
   Hazardous Waste [include HW Code(s) - see 'HW Codes' tab]

Characterization - Basis
Generator Knowledge
Analytical Data

Characterization - Reference
Describe basis for generator knowledge, and/or
Reference to lab report (e.g., lab name, report date, report location)

WAC = Wis. Administrative Code

2. **Waste Management:**
   Include name and EPA ID number for each transporter and destination facility, where applicable.
   Fate - describe fate of materials (e.g., landfill, incineration, fuel blending, etc.). Optional: Include formal 'Management Codes' - see 'Management Codes' tab.

Safety-Kleen Systems, Inc.

5360 Legacy Drive.
Building 2, Suite 100
Plano, Texas 75024
800-669-5740
608-241-3883

CUSTOMER# 237936 CASTALLOY INC.
Po Box 827
Waukesha WI 53187-0827
PHONE 262-547-0070

REFERENCE NBR.
51833757
SRVC WEEK: 2010-34
SRVC DATE: 08/19/10 09:17

PURCHASE ORDER#

TAX EXEMPTION NBR EXEMPT

PRODUCT/SERVICES

SERVICE/ PRODUCT		QTY	UNIT PRICE	TAX	TOTAL CHARGE
40433733/ 66674	USED OIL SRV PREQUAL CRED	275.000	-0.1000	0.00	-27.50
	SERVICE TERM 16 CHANGE TERM 52 CSM REMARKS N/A HALOGEN / CHLOR-D-TECT TEST RESULT PASS: PPM < 1000 PROMO NBR: 0				
	TOTAL SERVICE/PRODUCTS		-0.1000	0.00	0.00

TOTAL CHARGE	0.00
CREDITS	-27.50
TOTAL DUE	-27.50

UNPAID BALANCE THIS RECEIPT 0.00

Used oil in drums for non-auto generators classified as high risk.
Used oil certification form is required for all customers (initial sign-up and when status changes).

GENERATOR STATUS
CESQG: Non-vehicle

Customer certifies that (i) the above-named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and (ii) no material change has occurred either in the characteristics of the waste/material or in the process generating the waste/material. Customer agrees to pay the above charges and to be bound by the terms and conditions (1) set forth in (a) the General Terms and Conditions provided separately to Customer or (b) any SK agreement signed by Customer and SK, and (2) incorporated herein by reference. Unless otherwise indicated in the payment received section, SK is authorized to charge Customer's account for this transaction. Customer certifies that the individual signing this Service Acknowledgement is duly authorized to sign and bind Customer. The following provision is applicable to Safety-Kleen's parts cleaner and paint gun cleaner services: Customer agrees that it will not introduce any substance into the solvent or aqueous cleaning solution, including without limitation any hazardous waste or hazardous waste constituent, except to the extent such introduction is incidental to the normal use of the machine. Customer further agrees that it will not clean parts/paint guns that have been contaminated with or otherwise introduce polychlorinated biphenyls (PCB's), herbicides, pesticides, dioxins or listed hazardous waste into the solvent or aqueous cleaning solution. Safety-Kleen has the capacity and is permitted to accept, store, and/or reclaim the spent parts washer solvent; paint thinners, solvents and paints generated by customer; or dry cleaning filter cartridges, powder, and still residues containing perchloroethylene, petroleum naphtha, or triflurotrichloroethane dry cleaning solvents. Safety-Kleen and customer agree that this agreement is intended to satisfy the requirements of 40 CFR 262.20(e). IN THE EVENT OF AN EMERGENCY CALL 1-800-468-1760 (24 hours)

X

CUSTOMER / GENERATOR :na

X

TRANSPORTER :TMURPHY

REFERENCE NBR.
CUSTOMER#/GENERATOR: 237936 CASTALLOY INC. 51833757
Po Box 827
Waukesha WI 53187-0827 SRVC DATE: 08/19/10
PHONE 262-547-0070
GENERATOR USEPA ID. WID056068802 GENERATOR STATE
MANIFEST# 51833757 FORM CD: NR SK SHIP# 201753821
CARRIER 1 WID117520049
CARRIER 2

US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID)

USED OIL
(NOT USDOT HAZARDOUS MATERIAL)

FEDERAL WASTE CODES NONE
STATE WASTE CODES
TOTAL CONT 1 TYPE TT WT/VOL G SKDOT 1001
CNT#: 100819461678 QTY: 275 PROFILE: 040433733

DESIGNATED FACILITY NAME/ADDRESS:
SAFETY-KLEEN SYSTEMS, INC.
3715 LEXINGTON AVE
MADISON WI 53714

FACILITY USEPA ID NO WID117520049
FACILITY STATE ID NO

Used oil in drums for non-auto generators classified as high risk.
Used oil certification form is required for all customers (initial sign-up and when status changes).

GENERATOR STATUS
CESQG: Non-vehicle

Customer certifies that (i) the above-named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and (ii) no material change has occurred either in the characteristics of the waste/material or in the process generating the waste/material. Customer agrees to pay the above charges and to be bound by the terms and conditions (1) set forth in (a) the General Terms and Conditions provided separately to Customer or (b) any SK agreement signed by Customer and SK, and (2) incorporated herein by reference. Unless otherwise indicated in the payment received section, SK is authorized to charge Customer's account for this transaction. Customer certifies that the individual signing this Service Acknowledgement is duly authorized to sign and bind Customer. The following provision is applicable to Safety-Kleen's parts cleaner and paint gun cleaner services: Customer agrees that it will not introduce any substance into the solvent or aqueous cleaning solution, including without limitation any hazardous waste or hazardous waste constituent, except to the extent such introduction is incidental to the normal use of the machine. Customer further agrees that it will not clean parts/paint guns that have been contaminated with or otherwise introduce polychlorinated biphenyls (PCB's), herbicides, pesticides, dioxins or listed hazardous waste into the solvent or aqueous cleaning solution. Safety-Kleen has the capacity and is permitted to accept, store, and/or reclaim the spent parts washer solvent; paint thinners, solvents and paints generated by customer; or dry cleaning filter cartridges, powder, and still residues containing perchloroethylene, petroleum naphtha, or trifluorotrichloroethane dry cleaning solvents. Safety-Kleen and customer agree that this agreement is intended to satisfy the requirements of 40 CFR 262.20(e). IN THE EVENT OF AN EMERGENCY CALL 1-800-468-1760 (24 hours)

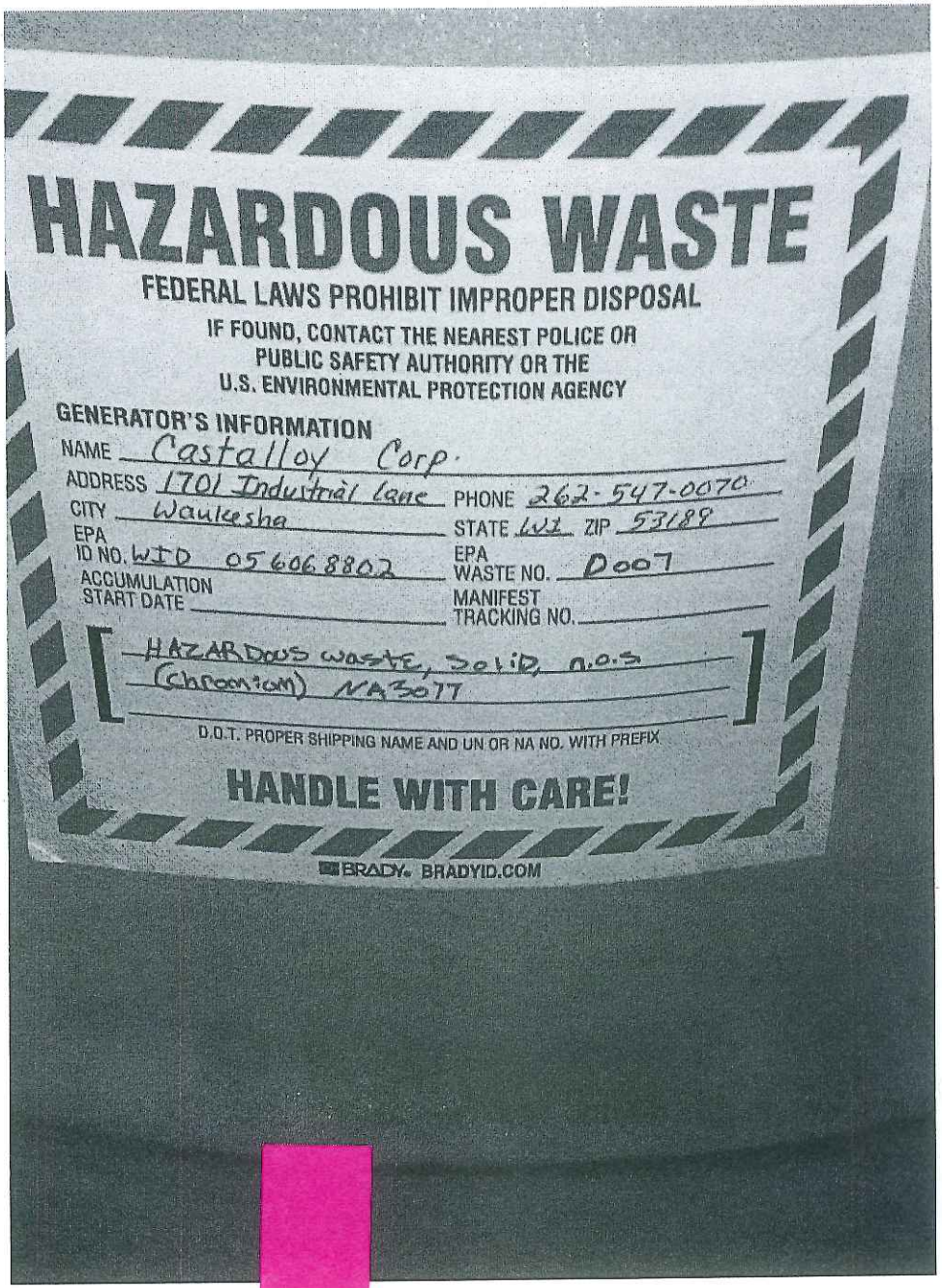
X 

CUSTOMER / GENERATOR :na

X 

TRANSPORTER :TMURPHY

LAST PAGE


HAZARDOUS WASTE
FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERATOR'S INFORMATION
NAME Castalloy Corp.
ADDRESS 1701 Industrial Lane
PHONE 262-547-0070
CITY Waukesha
STATE WI ZIP 53189
EPA ID NO. WID 056068802
EPA WASTE NO. D007
ACCUMULATION START DATE
MANIFEST TRACKING NO.
HAZARDOUS waste, solid, n.o.s (Chromium) NA3077
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
HANDLE WITH CARE!
BRADY BRADYID.COM